

AFFIRMATIVE DEFENSES

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Defendant(s) hereby incorporate(s) by reference those affirmative defenses  
enumerated in JCRC 8 as though fully set forth herein, as applicable upon discovery. In the  
event further investigation or discovery reveals the applicability of any such defenses,  
Defendant(s) reserve(s) the right to seek leave of court to amend this Answer to more  
specifically assert any such defense. Such defenses are herein incorporated by reference for the  
specific purposes of not waiving any such defenses.

8        Accord and satisfaction.

9        Arbitration and award.

10       Assumption of risk.

11       Contributory negligence.

12       Discharge in bankruptcy.

13       Duress.

14       Estoppel.

15       Failure of consideration.

16       Fraud. Plaintiff does not reside in Mississippi.

17       Illegality.

18       Injury by fellow servant.

19       Laches.

20       License.

21       Payment.

22       Release.

23       Res Judicata. See exhibit 7a-C. Previous court judgement.  
(attached)

24       Statute of frauds.

25       Statute of limitations.

Waiver.

## ABSTRACT OF CIVIL COURT RECORD FROM JUSTICE COURT

THE STATE OF MISSISSIPPI  
KEMPER COUNTYBOOK 300 PAGE 1461  
STATUS: A

AP

In the Justice Court of said County at the August term thereof, A.D. 2019, judgement was rendered as follows, namely: in the case of

WRIGHT DORSYL  
VS  
DAVIS KATHY  
300 WALTER REED RD  
PRESTON, MS 39354

Amount of Judgement rendered	th day of	, 0000
COURT FEE .....	\$	64.00
.....	\$	
.....	\$	
.....	\$	
.....	\$	
TOTAL .....	\$	64.00
AMOUNT PAID ON JUDGEMENT \$		
LEAVING DUE THEREON .... \$		64.00

CAUSE OF ACTION: REPLEVIN

FILED: 08/13/2019

DISPOSITION: NO JUDGEMENT GIVEN

DATE: 08/27/2019

JUDGMENT DATE: 00/00/0000 IN FAVOR OF:

JUDGMENT AMOUNT GARNISHMENT: (Y/N)

DORSYL WRIGHT ACKNOWLEDGED UNDER OATH THAT SHE WAS AWARE OF FORCLOSURE FEB 2019 AND NOTICE FROM CHANCERY COURT JUNE 2019 AND KATHY DAVIS OWNED THE PROPERTY AS OF JULY 11, 2019. NO JUDGMENT RENDERED AGAINST KATHY DAVIS 08/27/2019, GULLY

I CERTIFY THAT THIS IS A TRUE AND CORRECT COPY OF THE COURT RECORD AS RECORDED IN : BOOK 300 PAGE 1461

LYNN PUCKETT, CLERK  
KEMPER COUNTY JUSTICE COURT



BY: \_\_\_\_\_

\*\* Please Reference BOOK 300 PAGE 1461 on all correspondence

RC

## JUDGEMENT/ADDENDUM INFORMATION

Dawn Darsl Wright  
Acknowledged under oath  
that she was aware of foreclosure  
Feb 2019 and notice from chancery  
June 2019 and Kathy Davis owned  
property as of July 11, 2019  
No judgement rendered  
against Kathy Davis 8-27-  
ADDENDUM INFORMATION July

Attorney

Jeremy Chalmers



**Chalmers Law Inc.**

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